

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

USDC SDNY  
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DOC #:  
DATE FILED: JAN 03 2008

MEIJER, INC. and MEIJER DISTRIBUTION, INC.,  
on behalf of themselves and all others similarly situated,

Plaintiffs,

vs.

LG ELECTRONICS, INC.; LP DISPLAYS  
INTERNATIONAL LTD. f/k/a LG. PHILIPS  
DISPLAYS; KONINKLIJKE PHILIPS  
ELECTRONICS N.V. a/k/a ROYAL PHILIPS  
ELECTRONICS N.V.; PHILIPS ELECTRONICS  
NORTH AMERICA CORPORATION;  
MATSUSHITA ELECTRIC INDUSTRIAL CO., LTD.;  
PANASONIC CORPORATION OF NORTH  
AMERICA; SAMSUNG ELECTRONICS CO., LTD.;  
SAMSUNG SDI CO. LTD. f/k/a SAMSUNG DISPLAY  
DEVICE CO. LTD.; SAMSUNG ELECTRONICS  
AMERICA, INC.; SAMSUNG SDI AMERICA, INC.;  
TOSHIBA CORPORATION; TOSHIBA AMERICA  
ELECTRONICS COMPONENTS, INC.; TOSHIBA  
AMERICA INFORMATION SYSTEMS, INC.;  
MATSUSHITA TOSHIBA PICTURE DISPLAY CO.,  
LTD. a/k/a MT PICTURE DISPLAY CO., LTD.; MT  
PICTURE DISPLAY CORPORATION OF AMERICA  
(NEW YORK); MT PICTURE DISPLAY  
CORPORATION OF AMERICA (OHIO);  
CHUNGHWA PICTURE TUBES, LTD.; and  
TATUNG COMPANY OF AMERICA, INC.,

Defendants.

Civil Action No.: 07 CV 10674 (UA)

STIPULATION RE EXTENSION OF  
TIME FOR DEFENDANT TO  
ANSWER, MOVE, OR OTHERWISE  
RESPOND TO PLAINTIFF'S  
COMPLAINT

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WHEREAS Plaintiffs Meijer, Inc. and Meijer Distribution, Inc. ("Plaintiffs") filed a complaint in the above-captioned case on or about November 29, 2007;

WHEREAS Plaintiffs allege antitrust violations by manufacturers, distributors, and sells of cathode-ray tubes and products containing cathode-ray tubes (collectively, "CRT products");

WHEREAS six complaints have been filed to date in federal district courts through the United States by plaintiffs purporting to bring class actions on behalf of direct and indirect purchasers alleging antitrust violations by manufacturers, distributors, and sellers of CRT products (collectively, "the CRT Cases");

WHEREAS a motion is pending before the Judicial Panel on Multidistrict Litigation to transfer the CRT Cases to this jurisdiction for coordinated and consolidated pretrial proceedings pursuant to 28 U.S.C. § 1407, a response to the motion has been filed, and the parties anticipate that additional responses will be filed by Plaintiffs and various defendants;

WHEREAS Plaintiffs anticipate the possibility of a consolidated amended complaint in the CRT Cases;

WHEREAS Plaintiffs and Defendant Philips Electronics North America Corporation ("Philips") have agreed that an orderly schedule for any response to the pleadings in the CRT Cases would be more efficient for the parties and for the Court;

WHEREAS Plaintiffs agree that the deadline for Philips to answer, move, or otherwise respond to the complaint shall be extended until the earliest of the following dates: (1) forty-five days after the filing of a consolidated amended complaint in the CRT Cases; or (2) forty-five days after Plaintiffs provide written notice to Philips that Plaintiffs do not intend to file a consolidated amended complaint, provided, however, that, in the event that Philips should

agree to an earlier response date in any CRT case, Philips will respond to the complaint in the above-captioned action on that earlier date;

WHEREAS Philips agrees that, if any other steps are taken in any other CRT Case – such as the production of documents, the entry of any stipulation to preserve documents or similar activity – Philips will undertake such actions in this case as well;

WHEREAS Plaintiffs further agree that this extension is available, without further stipulation with counsel for Plaintiffs, to all named defendants who notify Plaintiffs in writing of their intention to join this stipulation and abide by its terms as of they were Philips;

WHEREAS this stipulation does not constitute a waiver by Philips of any defense, including, but not limited to, the defenses of lack of personal jurisdiction, subject matter jurisdiction, improper venue, sufficiency of process or service of process; and

WHEREAS with respect to any named defendant joining the stipulation, this stipulation does not constitute a waiver of any defense, including, but not limited to, the defenses of lack of personal jurisdiction, subject matter jurisdiction, improper venue, sufficiency of process or service of process.

THEREFORE, Plaintiffs and defendant Philips, by and through their respective counsel of record, hereby stipulate as follows:

1. The deadline for Philips to answer, move, or otherwise respond to the complaint shall be extended until the earliest of the following dates: (1) forty-five days after the filing of a consolidated amended complaint in the CRT Cases; or (2) forty-five days after Plaintiffs provide written notice to Philips that Plaintiffs do not intend to file a consolidated amended complaint, provided, however, that, in the event that Philips should agree to an earlier response date in any

CRT Case, Philips will respond to the complaint in the above-captioned action on that earlier date.

2. If any other steps are taken in any other CRT Case in which Philips is named as a party – such as the production of documents, the entry of any stipulation to preserve documents or similar activity – Philips will undertake such actions in this case as well.

3. This extension is available, without further stipulation with counsel for Plaintiffs, to all named defendants who notify Plaintiffs in writing of their intention to join this stipulation.

4. This stipulation does not constitute a waiver by Philips, or any other named defendant joining the stipulation, of any defense, including, but not limited to, the defenses of lack of personal jurisdiction, subject matter jurisdiction, improper venue, sufficiency of process or service of process.

**IT IS SO STIPULATED.**

Dated: December 19, 2007

By: Gregory K. Arenson  
Robert N. Kaplan (RK-3100)  
Linda P. Nussbaum (LN-9336)  
Gregory K. Arenson (GK-2426)  
**KAPLAN FOX & KILSHEIMER LLP**  
850 Third Avenue, 14th Floor  
New York, NY 10022  
Telephone: (212) 687-1980  
Fax: (212) 687-7714  
E-mail: rkaplan@kaplanfox.com  
lnussbaum@kaplanfox.com  
garenson@kaplanfox.com

*So Ordered.*


*Jennifer Cote*  
*Part I*

*December 21, 2007*

Joseph M. Vanek  
David P. Germaine  
**VANEK, VICKERS & MASINI P.C.**  
111 South Wacker Drive, Suite 4050  
Chicago, IL 60606  
Telephone: (312) 224-1500  
Fax: (312) 224-1510  
E-mail: [jvanek@vaneklaw.com](mailto:jvanek@vaneklaw.com)  
[dgermaine@vaneklaw.com](mailto:dgermaine@vaneklaw.com)

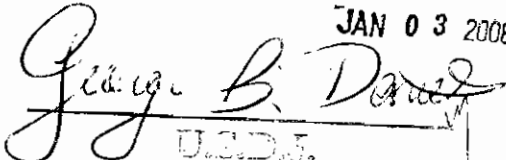
Paul E. Slater  
**SPERLING & SLATER**  
55 West Monroe Street, Suite 3200  
Chicago, IL 60603  
Telephone: (312) 641-3200  
Fax: (312) 64106492  
E-mail: [pes@sperling-law.com](mailto:pes@sperling-law.com)

Attorneys for individual and representative  
plaintiffs Meijer, Inc. and Meijer Distribution, Inc.

By:   
Ethan E. Litwin (EL 7083)

**HOWREY LLP**  
153 East 53<sup>rd</sup> Street, 54<sup>th</sup> Fl.  
New York, NY 10022  
Telephone: (212) 896-6591  
Fax: (212) 896-6501  
E-mail: [litwine@howrey.com](mailto:litwine@howrey.com)

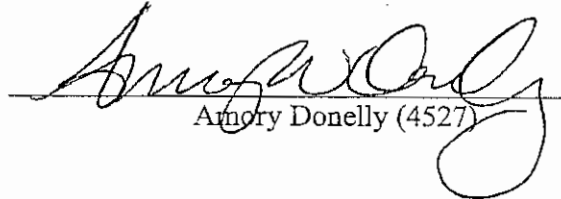
Attorneys for Defendant Philips Electronic North  
America Corporation

  
JAN 03 2008  
U.S.D.J.  
HON. GEORGE B. DANIELS

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and accurate copy of the preceding document was sent, in the manner described below, to the following attorneys on this 20th day of December 2007.

Gregory Keith Arenson  
Linda P. Nussbaum  
Robert N. Kaplan  
Kaplan Fox & Kilsheimer LLP  
850 Third Avenue  
14th Floor  
New York, NY 10022  
(212) 687-1980  
Fax: (212) 687-7714  
By mail

  
Amory Donnelly (4527)